

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SOUTH AFRICAN BUNKERING AND TRADING LTD; §

VS. §

Labpro Pharma LLC §

MSBE Ventures Inc §

Defendants §

And §

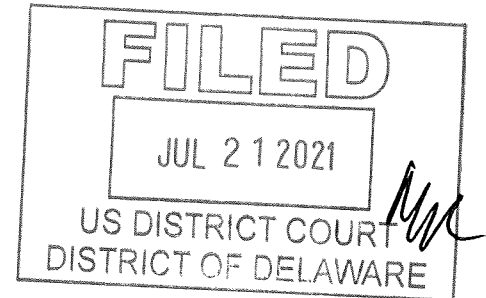
Bank of America N.A §

GoDaddy.com,LLC §

Garnishees §

CIVIL ACTION 21-866(UNA)

IN ADMIRALTY, Rule 9(h)



***DEFENDANT'S VERIFIED ANSWER TO MOTION TO STRIKE OFF VERIFIED
ANSWER TO PROCESS OF MARITIME ATTACHMENT AND GARNISHMENT***

NOW comes, the Defendants LabPro Pharma LLC, and MSBE Ventures Inc and makes this limited appearance or special appearance to Plaintiff's South African Bunkering and Trading Ltd. (SABT) *quasi in rem* action pursuant to Supplemental Rule B for Certain Admiralty and Maritime Claims, requesting the issue of writs of maritime attachment and garnishment including against Garnishees and States as Follows:

I.

Plaintiff is working very hard to avoid due process and silence the voice of the defendant to be heard by a court of law in the United States of America prior to judgement. The law allows each party to be heard so that the judge can adjudicate in a fair manner.

II.

The court should vacate plaintiff request to strike the verified answer of the defendant and schedule a hearing for the defendant to have the opportunity to present the facts as known to

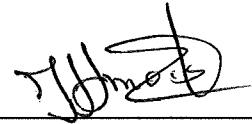
the defendant. Worthy of note is the fact that no attempt at mediation has been done and plaintiff has categorically refused to talk about the matter because the desire to get a court judgment is the only motive here.

Further, if the court agrees that an attorney for the defendant is a *conditio sine qua non* to entering an appearance in this matter, the defendant prays that the court allows it sufficient time to retain the services of an attorney experienced in this matter to enter appearance.

PRAYER

WHEREFORE, Defendant prays the verified answer be entered into the proceedings and a date be set for trial. That the motion to strike the defendant's verified answer be ignored and due process be upheld.

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Dr. Moise Arrah', written over a horizontal line.

Dr. Moise Arrah
Defendant.

Visit theupsstore.com to find a local

Domestic Shipments

- To qualify for the Letter rate, UPS Express Envelopes must be used for correspondence, urgent documents, and/or electronic data that weigh 8 oz. or less. UPS Express Envelopes containing those listed or weighing more than 8 oz. will not qualify.

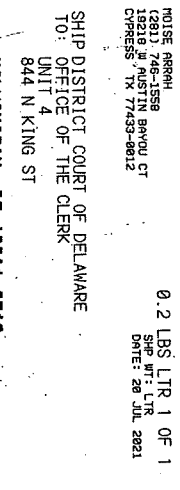
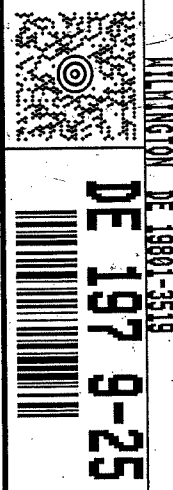
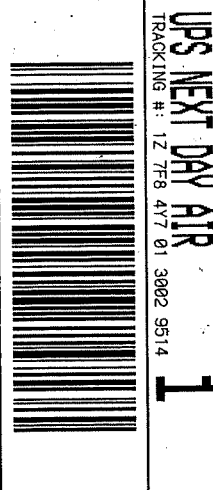
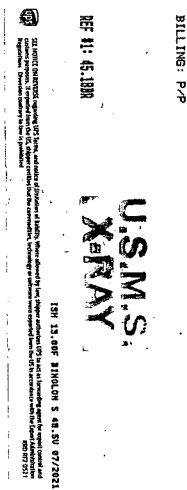
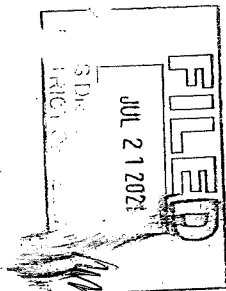
International Shipments

- The UPS Express Envelope may be used only for international shipments. Certain countries consider electronic data as a commercial shipment. Visit ups.com/importexport to verify if your shipment is eligible.
- To qualify for the Letter rate, the UPS Express Envelope must be used for correspondence, urgent documents, and/or electronic data that weigh 8 oz. or less. UPS Express Envelopes containing those listed or weighing more than 8 oz. will not qualify.

Note: Express Envelopes are not recommended for shipments containing sensitive personal information or cash equivalent.

OFFICE OF THE CLERK
844 N KING ST
UNIT 4
WILMINGTON DE 19801

P: ORANGE S. LEFT
525-1024 X
1278470-1002 0614
SHIP DATE: JUL 21 2021
SHIP TIME: 1030



Serving you for more than 100 years
United Parcel Service.



International Shipping Notice — Carriage hereunder may be subject to the rules relating to liability and other terms and/or conditions established by the Convention for the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or the Convention on the Contract for the International Carriage of Goods by Road (the "CMR Convention"). These commodities, technology or software were exported from the U.S. in accordance with the Export Administration Regulations. Diversion contrary to U.S. law prohibited.

01880250709 11/18 United Parcel Service

100% Recycled fiber
80% Post-Consumer

